

To: Pfeifer, David[pfeifer.david@epa.gov]
Cc: Wagener, Christine[wagener.christine@epa.gov]
From: Paula Maccabee
Sent: Thur 3/26/2015 1:19:47 PM
Subject: Minnesota Wild Rice Rulemaking - Proposed Formula

Hi, David:

It was good to have a chance to talk with you this morning about Minnesota's proposed wild rice sulfate formula, proposed to replace the wild rice sulfate water quality standard. I understand that you already have a copy of my February 27, 2015 letter excerpting the peer review panel's comments on this concept. The panel suggested that additional studies as well as statistical re-analysis were needed in order to validate the conceptual model proposed by the MPCA:

"Although the conceptual model described in the Synthesis is qualitatively correct, the current Synthesis goes too far in implying that sulfide concentrations in sediment can be predicted accurately by the multiple quantile regression model based on sulfate concentrations in the overlying water and acid-extractable iron in sediments. . .

"Re-analysis should improve the overall value of the current datasets in understanding the concentrations at which sulfate and sulfide act adversely on wild rice. In light of this re-analysis, further studies can then be considered to fill data gaps, including those proposed by the review panel, as well as others." (Peer Review Report, Reviewer Conclusions and Recommendations, p. 9)

You asked whether John Pastor or other scientists have expressed concerns about the MPCA's wild rice sulfate formula proposal. The following articles in the news media reflect scientific concerns about the proposal, among other comments:

<http://www.startribune.com/politics/statelocal/297399241.html>

<http://www.mprnews.org/story/2015/03/25/mpca-wild-rice>

<http://www.duluthnewstribune.com/news/3707071-mpca-wants-individual-sulfate-limits-wild-rice-waters>

I would appreciate the chance to discuss the MPCA's proposal further once you have had a chance to review it in more detail.

Best regards,

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